

Exhibit G

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANIEL KLEEBERG, LISA STEIN
and AUDREY HAYS,

Plaintiffs,

v.

Civil Action No.
16-CV-9517(LAK)

LESTER EBER,
ALEXBAY, LLC f/k/a LESTER EBER, LLC,
CANANDAIGUA NATIONAL CORPORATION d/b/a
CANANDAIGUA NATIONAL BANK AND TRUST,
ESTATE OF ELLIOT W. GUMAER, JR.,
EBER BROS. & CO, INC.,
EBER BROS. WINE AND LIQUOR CORP.,
EBER BROS. WINE & LIQUOR METRO, INC.,
EBER-CONNECTICUT, LLC, and
WENDY EBER,

Defendants.

**RESPONSES TO PLAINTIFF
LISA STEIN'S FIRST SET OF
INTERROGATORIES TO
DEFENDANT WENDY EBER**

Pursuant to the Federal Rules of Civil Procedure, Rule 26(a)(1), Defendant, Wendy Eber, by her attorneys, Underberg & Kessler LLP, for her Responses to Plaintiff Lisa Stein's First Set of Interrogatories to Defendant Wendy Eber (the "Interrogatories"), hereby responds as follows:

SPECIFIC OBJECTIONS AND RESPONSES

1. Specify when you first began working for or with Alexbay, in any capacity, official or unofficial.

Response to No. 1: Defendant Wendy Eber has never officially or unofficially worked for Alexbay, but has been familiar with it since its formation in 2011.

2. Specify all positions held by you in connection with any Alexbay, the compensation associated with each position, and the dates when those positions were held.

Response to No. 2: See Response to No. 1, above.

3. Identify all persons who are or have ever been economic interest owners in Alexbay.

Response to No. 3: Lester Eber.

4. As to each person identified in response to Interrogatory No. 2 (including yourself if applicable), specify:

- a. The value or percentage of the economic interest (and if it changed over time, specify each value or percentage that has ever been held and the dates when those values or percentages applied);
- b. The consideration provided in exchange for the economic interest, and
- c. The date when the economic interest was acquired.

Response to No. 4: See Response to No. 1, above.

5. Identify all legal entities or businesses (excluding publicly traded companies) in which you have held any type of economic interest since 2007.

Response to No. 5: Defendant Wendy Eber has answered this question in responses to interrogatories previously served by Plaintiffs. Defendant Wendy Eber has no other information responsive to this Interrogatory other than what has been set forth in the Responses to the previous interrogatories.

6. Specify whether you provided any consideration to any Eber Defendant, or to Poleridge Bowman or any other third party, in connection with your receipt of the right of first refusal to acquire Poleridge Bowman's interest in Eber-Conn.

Response to No. 6: Yes.

7. Identify all current officers, directors, and managers of the Eber Companies and Alexbay.

Response to No. 7: The Eber Defendants and/or Defendant Lester Eber have answered this question in responses to interrogatories previously served by Plaintiffs. Defendant Wendy Eber has no other information responsive to this Interrogatory other than what has been set forth in the Eber Defendants' and/or Lester Eber's Responses to the previous interrogatories.

8. Identify all persons who currently hold any kind of equity or ownership interest in any of the Eber Companies or Alexbay.

Response to No. 8: The Eber Defendants and/or Defendant Lester Eber have answered this question in responses to interrogatories previously served by Plaintiffs. Defendant Wendy Eber has no other information responsive to this Interrogatory other than what has been set forth in the Eber Defendants' and/or Lester Eber's Responses to the previous interrogatories.

9. As to each person identified in response to Interrogatory No. 8, specify as to each company:

- a. The type of equity interest held (e.g., Class A common shares);
- b. The amount of that equity interest (e.g., the number of shares or the percentage of the total); and
- c. The percentage of the total voting power within that company that is held by that person.

Response to No. 9: The Eber Defendants and/or Defendant Lester Eber have answered this question in responses to interrogatories previously served by

Plaintiffs. Defendant Wendy Eber has no other information responsive to this Interrogatory other than what has been set forth in the Eber Defendants' and/or Lester Eber's Responses to the previous interrogatories.

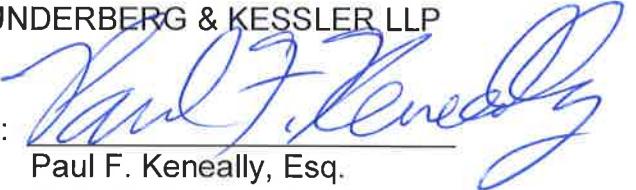
10. Identify any persons who have a contingent equity or ownership interest in any of the Eber Companies or Alexbay.

Response to No. 10: Defendant Wendy Eber has ownership interest in Eber-Metro. A copy of the Stand-Alone Restricted Stock Award Agreement is included in the Eber Defendants' August 28, 2018 document production marked as EB-00031284—EB-00031305.

DATED: August 28, 2018
Rochester, New York

UNDERBERG & KESSLER LLP

By:


Paul F. Keneally, Esq.
Colin D. Ramsey, Esq.
Attorneys for Eber Defendants
300 Bausch & Lomb Place
Rochester, New York 14604
585-258-2800
cramsey@underbergkessler.com
pkeneally@underbergkessler.com

TO: Brian C. Brook, Esq.
Clinton Brook & Peed
Attorneys for Plaintiffs
101 Hudson Street, Suite 2100
Jersey City, NJ 07302
212-256-1957
brian@clintonbrook.com

Robert Calihan, Esq.
Attorney for Defendant
Estate of Elliot W. Gumaer, Jr.
16 West Main Street, Suite 736
Rochester, New York 14614
585-232-5291
rcalihan@calihanlaw.com

VERIFICATION

STATE OF New York)
COUNTY OF New York) ss:

WENDY EBER, being duly sworn, deposes and says that: she is one of the Defendants in the within action; that deponent has read the foregoing Responses to Plaintiff Lisa Stein's First Set of Interrogatories to Defendant Wendy Eber and knows the contents thereof, and that the same is true to deponent's own knowledge, except as to those matters stated therein to be alleged upon information and belief, and that as to those matters deponent believes it to be true.

Wendy Eber
Wendy Eber

Sworn to before me this
28 day of August, 2018.

JANERISA ENCARNACION PUJOLS
Notary Public

